

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CRIMINAL DOCKET NO. 04-30046

UNITED STATES OF AMERICA)
Plaintiff)
)
vs.)
)
Albert Innarelli, Michael Bergdoll, Anthony Matos,)
Pasquale Romeo, Wilfred Changasie, Theodore Jarrett,)
Mark McCarthy, James Smith, Jonathan Frederick and)
Joseph Sullivan)
Defendants)

SUPPLEMENT TO MOTION OF THE DEFENDANT JOSEPH SULLIVAN
TO MODIFY CONDITIONS OF RELEASE

NOW HERE COMES the defendant, Joseph Sullivan, and supplements his previous motion to modify his conditions of release filed on July 28, 2005. The defendant seeks permission to travel to Topsail Island, North Carolina for a family vacation between the dates of August 12, 2005 and August 22, 2005. As grounds therefor, the defendant states that his brother has recently been redeployed from Iraq to Camp Lejune, North Carolina, and as such the family is traveling to Topsail Island, North Carolina to visit with him. The defendant states that his address will be 1211 Ocean Blvd., Topsail Island, North Carolina, 28445. The house is rented through Seacrest Realty which has a telephone number of 888-328-4201.

WHEREFORE, the defendant respectfully moves that this motion be allowed.

THE DEFENDANT
JOSEPH SULLIVAN

By /s/ Daniel D. Kelly
Daniel D. Kelly, Esq., of
Robinson Donovan, P.C.
1500 Main Street, Suite 1600
Springfield, MA 01115
Phone (413) 732-2301 Fax (413) 785-4658
BBO No.: 634648